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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 11-0939 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	PROTECTIVE ORDER RE PRODUCTION OF
v.)	DOCUMENTS BY BANK OF AMERICA, N.A.
)	
CRAIG ALLEN OGANS,)	
a/k/a Byron Stuart Baker,)	
)	
Defendant.)	

STIPULATION

In preparation for the December 10, 2013 trial in this matter, the United States and the defendant in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. On September 17, 2013, the United States served a Rule 17 subpoena on Bank of America, N.A. ("Bank of America"). The return date for the subpoena was the trial date of December 10, 2013. In addition to other materials, the subpoena called for the production of certain code reference books to explain notations in the bank records and procedures for authenticating telephonic transactions.

2. Bank of America has informed the government that it considers certain materials

STIPULATION AND [PROPOSED] PROTECTIVE ORDER RE PRODUCTION OF DOCUMENTS BY BANK OF AMERICA, N.A.
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responsive to the subpoena to be proprietary and confidential. Furthermore, it has requested limited protective relief preventing the public dissemination of these proprietary and confidential materials.

3. For these reasons, the parties recommend that the Bank of America be permitted to mark "CONFIDENTIAL" those documents it deems are proprietary.

4. The parties further agree to file any materials marked "CONFIDENTIAL" by Bank of America under seal.

5. The receipt and use of any materials produced by Bank of America shall also be undertaken by the parties pursuant to the terms of the existing October 22, 2013 Protective Order relating to all discovery in this criminal action.

6. Finally, at the conclusion of this criminal action (including any appeal), the parties will consent to an order requiring any materials marked "CONFIDENTIAL" be returned to Bank of America.

STIPULATED AND AGREED TO:

DATED: December 6, 2013

MELINDA HAAG
United States Attorney

/s/

ADAM A. REEVES
Assistant United States Attorney

DATED: December 6, 2013


TAMOR & TAMOR

/s/

RICHARD A. TAMOR, ESQ.
Counsel for Defendant
Craig Allen Ogans

SO ORDERED.

Dated: 12/9/13


HON. RICHARD SEEBORG
United States District Judge